

## Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:  
[www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

For further information you can contact the Local Plan Group by:

- Emailing us at: [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- Phoning us on: (01274) 433679

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Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- Part A – Personal Details
- Part B – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- Part C – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

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Please return this completed representation form to the Local Plan Group by either:

- E-mail to: [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- Post to: Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must receive it no later than 5pm on Monday 31<sup>st</sup> March 2014**

|                      |  |  |
|----------------------|--|--|
| For Office Use only: |  |  |
| Date                 |  |  |
| Ref                  |  |  |

## Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

### Publication Draft - Representation Form

#### PART A: PERSONAL DETAILS

\* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

|                                  | 1. YOUR DETAILS* | 2. AGENT DETAILS (if applicable) |
|----------------------------------|------------------|----------------------------------|
| Title                            | Mrs              |                                  |
| First Name                       | [REDACTED]       |                                  |
| Last Name                        | Boon             |                                  |
| Job Title<br>(where relevant)    | [REDACTED]       |                                  |
| Organisation<br>(where relevant) | [REDACTED]       |                                  |
| Address Line 1                   | [REDACTED]       |                                  |
| Line 2                           | [REDACTED]       |                                  |
| Line 3                           | Ilkley           |                                  |
| Line 4                           |                  |                                  |
| Post Code                        | LS29 [REDACTED]  |                                  |
| Telephone Number                 | [REDACTED]       |                                  |
| Email Address                    | [REDACTED]       |                                  |
| Signature:                       | [REDACTED]       | Date: 28 March 2014              |

#### Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

| For Office Use only: |  |  |  |
|----------------------|--|--|--|
| Date                 |  |  |  |
| Ref                  |  |  |  |

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

|         |          |           |           |        |            |
|---------|----------|-----------|-----------|--------|------------|
| Section | <b>3</b> | Paragraph | <b>60</b> | Policy | <b>Sc4</b> |
|---------|----------|-----------|-----------|--------|------------|

**4. Do you consider the Plan is:**

|   |     |          |    |          |
|---|-----|----------|----|----------|
| 4 (1). Legally compliant                    | Yes | <b>x</b> | No |          |
| 4 (2). Sound                                | Yes |          | No | <b>X</b> |
| 4 (3). Complies with the Duty to co-operate | Yes |          | No |          |

**5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.**

**If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

**Ilkley has been designated a "principal town" alongside Keighley and Bingley**

1. (Section 3, para 60, policy SC4) yet:
2. Its population is less than 3% of the Bradford District total
3. It is one-third the size of Keighley
4. It is not an employment centre, more of a commuter centre (Section 2, para 52)
5. It sits on the edge of the District
6. Most administrative council services have been removed, there's no hospital or emergency medical facilities, bus services to Bradford have been withdrawn. Indeed, you will see that the plan documents are available for study at Ilkley Town Hall "By appointment only – Tuesdays"

|                      |  |
|----------------------|--|
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**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

|         |     |           |    |        |     |
|---------|-----|-----------|----|--------|-----|
| Section | 5.3 | Paragraph | 64 | Policy | HO3 |
|---------|-----|-----------|----|--------|-----|

**4. Do you consider the Plan is:**

|   |     |   |    |   |
|---|-----|---|----|---|
| 4 (1). Legally compliant                    | Yes | x | No |   |
| 4 (2). Sound                                | Yes |   | No | x |
| 4 (3). Complies with the Duty to co-operate | Yes |   | No |   |

**5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.**

**If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

**800 new homes are planned for Ilkley over the life of the plan**

1. (Section 5.3, para 64, policy HO3)
2. There has been no attempt to assess local need
3. The strategy sets out positive measures for minimising green belt releases, valuing green infrastructures, protecting habitats (Section 3 paras 103 – 116 policy SC8), minimising additional travel arising from development, boosting tourism all of which are at odds with the scale of building proposed
4. Housing numbers have been reduced on account of a Habitats Regulations Assessment (HRA), but only by 38% in Ilkley whereas the combined reduction across the rest of Wharfedale is 56%
5. The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA (Section 3 para 106)
6. It is unclear from the strategy therefore how the figure of 800 was calculated
7. No account is taken of Ilkley's fairly unique house building profile and the fact that there's an ongoing process of re-development of large individual property sites and this has lead to a windfall of around 600 new homes since 2004 (such "windfalls" are excluded from any calculations)

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|------|--|--|--|
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| Ref  |  |  |  |

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

|         |   |           |      |        |               |
|---------|---|-----------|------|--------|---------------|
| Section | 3 | Paragraph | 15.3 | Policy | Core Strategy |
|---------|---|-----------|------|--------|---------------|

**4. Do you consider the Plan is:**

|   |     |   |    |   |
|---|-----|---|----|---|
| 4 (1). Legally compliant                    | Yes | x | No |   |
| 4 (2). Sound                                | Yes |   | No | x |
| 4 (3). Complies with the Duty to co-operate | Yes |   | No |   |

**5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.**

**If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

**Our existing road network (the A65 basically) is already overcrowded and is simply not capable of sustaining such a level of development when:**

1. Leeds Council is also planning to build 2300 new homes in Aireborough, also served by the A65?
2. Two studies in recent years have concluded the A65 is congested and there are very limited opportunities to increase highway capacity, the route through the centre of Ilkley being a huge hurdle?
3. Despite this the LIP does not propose any investment?
4. Studies have also suggested that each new home leads to an extra 8 vehicle journeys per day and yet a key aim of integrated land use and transport planning is to reduce the need to travel (Section 5.2 para 13)?
5. Measures are being encouraged to increase tourism/visitor numbers to Ilkley?

**Ilkley is already overcrowded with cars and it will be unable to sustain the parking requirements of increased numbers of residents, commuters and visitors when**

1. Parking is already inadequate for commuters needing day long parking?
2. Land is scarce?

**The existing rail network can only just cope at rush hour and will obviously be unable to cope with extra commuters when**

1. It is already experiencing overcrowding on peak trains?
2. The LIP recognises the need for additional rolling stock but admits there is no committed funding for this?
3. There seems little scope for increasing capacity in train length (short platforms) or in frequency (congestion at Leeds station and single track working on parts of Leeds and Bradford lines)?

**AS a school governor I know that all our primary schools are already FULL and Ilkley Grammar is currently overcrowded.**

1. Bradford District Education Organisation Plan shows that primary schools in the Wharfe valley are presently over-subscribed and will continue to be so until 2017 which is as far as the Education Plan

goes?

2. The need to increase the capacity of Ilkley Grammar School has long been recognised by the council, and in fact an earlier earmarked site in Ben Rhydding is now a potential site for new homes?
3. The LIP recognises that the shortage of school places "could pose significant challenge to delivering growth" (LIP para 5.5.1) yet has no proposals to alleviate the situation?
4. The extra demand will surely lead to schooling solutions outside the Wharfedale catchment area with extra car. More traffic would lead to us usage and attendant impacts on environment?

**Ben Rhydding Drive is a small and secluded road which is only single lane.**

1. There is insufficient drainage on the road as it is. More houses would make this impossible to drain
2. The LISTED gates at the bottom only allow for one car at a time to pass through and they are already clogged at rush hour. How could these sustain more traffic
3. The road is dangerous for pedestrians already. More cars would simply make this worse.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Of course we all need more housing. That is a given and no right-minded person objects to it.  
However, one of the things that makes the area so attractive are the green areas we can all enjoy. Surely, with the various brown field sites available around the Bradford area it makes sense to use these first before destroying our green belt FOREVER. Once it's gone, it's gone and none of us can reclaim it.  
The plan should be altered to focus on using up the available brown field sites first. If there is still insufficient space, then of course we need to look elsewhere, but that has NOT been done as yet.

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.*

*After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

|                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | No, I do not wish to participate at the oral examination |
| <input checked="" type="checkbox"/> | Yes, I wish to participate at the oral examination       |

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Because for all the above reasons stated, I believe that the plan as currently submitted is fundamentally flawed and requires serious modification.

*Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.*

9.  
Signature:

[Redacted Signature]

Date:

28 March 2014